



*Consulting Engineers
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March 10, 2011
(PBW Project No. 1649)

VIA FEDERAL EXPRESS

Mr. Gary Miller
Superfund Division, Region 6 (6SF-RA)
Arkansas/Texas Section
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Ms. Rita Engblom, On-Scene Coordinator
U.S. Environmental Protection Agency, Region 6
Superfund Division (6SF-AP)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: February 2011 Monthly Report for UAO and February 2011 Monthly Report for Settlement Agreement, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller and Ms. Engblom:

Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly report on behalf of the Respondents LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow) pursuant to Section XII, Paragraph 53 of the amended Unilateral Administrative Order (UAO) and Section VIII, Paragraph 41.a of the Administrative Settlement Agreement and Order on Consent for Removal Action (Settlement Agreement) for the above-referenced Site. Parker Drilling Company has recently begun participating in the Site work as well under an agreement it reached with the above Respondents. As discussed in my telephone conversation with Mr. Miller on August 2, 2005, regarding the UAO, monthly status reports for a given month will be submitted by the 15th of the following month as required in Paragraph 53 of the UAO, rather than by the 10th of the following month as indicated in Appendix 1 of the Statement of Work (SOW) attached to the UAO. The Settlement Agreement requires submittal of a progress report by the 15th of every month.

In accordance with the UAO requirements for the Remedial Investigation/Feasibility Study (RI/FS) this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
 - Risk Assessment activities (SOW Paragraph 37) detailed under Task 7 of the RI/FS Work Plan, including preparation and submittal of the Draft BERA Report to EPA on February 7, 2011;

- Remedial Investigation Report activities (SOW Paragraph 39) detailed under Task 9 of the RI/FS Work Plan, including preparation and submittal of the Draft RI Report to EPA on February 7, 2011; and
 - Feasibility Study activities (SOW Paragraph 44) detailed under Task 10 of the RI/FS Work Plan, including partial preparation of the Final RAM to be submitted to EPA by March 11, 2011.
2. Results of RI/FS sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – No new analytical data were received during the previous month.
 3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of RI/FS work – The following actions are planned for the next two months:
 - Preparation and submittal of the Final BERA Report (based on EPA comments on the Draft BERA Report received on March 2, 2011);
 - Preparation and submittal of the Final RI Report (based on EPA comments on the Draft RI Report received on March 10, 2011);
 - Preparation and submittal of the Final RAM Report; and
 - Preparation of the Draft Feasibility Study (FS) Report.
 4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – RI/FS activities are approximately 90% complete.

In accordance with the Settlement Agreement requirements, this report also addresses the topics listed below for the Removal Action:

1. Significant Removal Action developments during the preceding period, including actions performed and any problems encountered – The following actions were taken during the previous month:
 - Off-site disposal of tank content wastes and excavated soils; and
 - Preparation and submittal of the Draft Removal Action Report to EPA on February 24, 2011.
2. Removal Action analytical data received during the reporting period – No new analytical data were received during the reporting period.
3. Removal Action developments anticipated during next reporting period, including a schedule of actions to be performed, anticipated problems, and planned resolutions of past or anticipated problems – In a February 23, 2011 e-mail to Mr. Miller, I requested that the deadline for completion of removal action field activities be extended to March 25, 2011 to allow for removal of the last six roll-off boxes remaining at the Site pending assignment of disposal slots from the Clean Harbors incinerator used for disposal of hazardous solids generated during the removal action. This extension request was subsequently approved by Mr. Miller in a February 23, 2011 e-mail. It is anticipated that during the next reporting period, these remaining

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roll-off boxes will be removed from the Site, and the Final Removal Action Report will be prepared and submitted to EPA based on modifications requested in EPA's report approval letter received on March 10, 2011.

Thank you for the opportunity to submit this monthly report. Should you have any questions, please do not hesitate to contact me.

Sincerely,

PASTOR, BEHNING & WHEELER, LLC



Eric F. Pastor, P.E.
Principal Engineer

cc: Mr. Doug McReynolds – EA Engineering, Science and Technology
Ms. Luda Voskov – Texas Commission on Environmental Quality
Mr. Ray Merrell – Sequa Corporation
Mr. John Eldridge – Haynes and Boone, LLP
Mr. Donnie Belote - The Dow Chemical Company
Mr. Ed Menger – Parker Drilling Company
Mr. Allen Daniels - LDL Coastal Limited, LP
Mr. F. William Mahley - Strasburger & Price, LLP
Mr. James C. Morriss III - Thompson & Knight, LLP
Ms. Elizabeth Webb - Thompson & Knight, LLP
Mr. Jay Winters – Golder Associates, Inc.